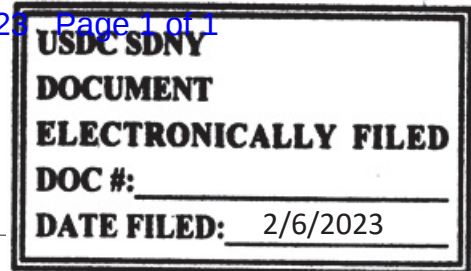




LAW OFFICES OF LAURIE E. MORRISON



February 3, 2023

100 Church Street, 8th Floor  
New York, New York 10007

Montclair, New Jersey 07042

Phone: (212) 721-4051  
Cell: (646) 457-8347  
morrison@lemorrisonlaw.com**VIA ECF**Hon. Stewart D. Aaron, U.S.M.J.  
500 Pearl Street, Courtroom: 11C  
New York, NY 10007

Deputy Phone: (212) 805-4620; Chambers Phone: (212) 805-0274

**RE: La Van et al. v. Goodwill et al.**  
**Civ. Action No.: 21-cv-05311 (RA)(SDA)**

Dear Hon. Aaron:

As Your Honor is aware, discovery was stayed/extended in this case until February 28<sup>th</sup>, due to the passing of Plaintiff Tiwana La Van's young son and to Ms. La Van's pregnancy. (Order, Dkt. 50). Plaintiffs write, with Defendants' consent, to respectfully request 45-days from the end of the stay/extension period (i.e., until April 14<sup>th</sup>) to complete discovery.

The parties have also been engaging in good faith settlement negotiations, and we will continue to do so. The parties will notify the Court if a settlement in-principal is reached.

To briefly update the Court on the status of discovery, the parties served discovery requests and responses, Defendants received records from Plaintiffs' medical/health providers, and the attorneys are continuing to finalize search terms for Defendants' electronic document production to supplement their discovery responses. If the case is not resolved by the end of the February 28<sup>th</sup> stay/extension period, then the parties would need 45-days to complete paper discovery and to take and complete approximately nine depositions, including those of the three Plaintiffs, of the two individual Defendants (who are current/former employees of the Defendant Entity, Goodwill), and of approximately four other current/former employees of Goodwill.

The parties thank the Court for its time and consideration.

Respectfully Submitted,

Laurie E. Morrison, Esq.

*Attorney for Plaintiffs*

Application GRANTED. However, although the Court has been lenient with the discovery deadlines due to Plaintiff LaVan's difficult situation, if the case does not resolve by February 28, 2023, the Court expects the parties to diligently pursue discovery, particularly to the extent that such discovery does not involve Plaintiff LaVan. No further extensions of the discovery deadline shall be granted absent exigent circumstances and then only for a specific, limited purpose. SO ORDERED.

Dated: February 6, 2023